

**From:** [Ted Goodman](#)  
**To:** [Houghton-Larsen, M Annie](#)  
**Cc:** [Nathan, Aaron E.](#); [Gubernski, Meryl Conant](#)  
**Subject:** Re: Freeman v. Giuliani - Delinquent Information Subpoena  
**Date:** Friday, November 15, 2024 5:17:38 PM

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**\*\*\* EXTERNAL EMAIL \*\*\***

Good evening.

I think you are mistaken. I handle political and communications for the mayor. I am not involved with his finances or business decisions. I created our livestream show together, and I handle political and communications matters.

I am happy to work with you guys to clear this up.

Happy Friday!

Ted

On Thu, Nov 14, 2024 at 6:16 PM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Ted,

We are not aware that you are currently represented in connection with this action, please direct me to your attorney if that is incorrect.

I am attaching a motion to compel, the Court's order regarding the same, and a subpoena to this email. Please confirm your acceptance of service.

Thank you,

Annie

**M.Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
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[mhoughton-larsen@willkie.com](mailto:mhoughton-larsen@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)  
Pronouns: she, her, hers

**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Sent:** Wednesday, November 6, 2024 7:35 PM  
**To:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>  
**Cc:** Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>  
**Subject:** Freeman v. Giuliani - Delinquent Information Subpoena

Ted,

I am writing regarding the information subpoena and restraining notice we served upon you via certified mail, delivered August 8, 2024, and personally in the lobby of 787 Seventh Avenue on September 10, 2024. A copy of which is attached here. C.P.L.R. § 5224(a)(3) provides that answers shall be returned together with the original of the questions within seven days after receipt. We are long past 7 days from either August 8 or September 10, but we have not received any response from you.

Please promptly advise whether you intend to return any response. If we do not hear from you by Monday, November 11 at noon, we will plan to file a motion to compel your compliance.

Thank you,

Annie

**M.Annie Houghton-Larsen**  
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Pronouns: she, her, hers

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